

DATE: June 3. 81

R.C.R.A. HAZARDOUS WASTE COMPLIANCE QUESTIONNAIRE
WASHINGTON DEPARTMENT OF ECOLOGY - INDUSTRIAL SECTION

Industry name and address:

Aluminum Company of America
P.O. BOX 221
Wenatchee Washington
98801

EPA Identification Number:

WAD 009270794

Telephone: (509) 663 9273

Industry representatives present: Jim Thompson

Regulatory Agency representatives present: Roger Stanley, Ted Mix (WDOE), Paul Boys (EPA)

Part A application filed? yes

Date: 1/14/81

Entity presently classified as: Generator

X

Transporter

Treatment site

Storage facility

Disposal site

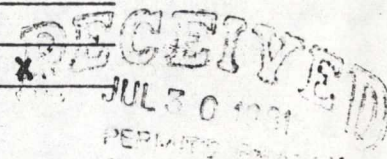
Hazardous Wastes listed on Part A Application:

I.D. No.	Type & Origin	Disposal Method
1. F001	chlorinated hydrocarbons (degreaser solvent - primarily trichloroethylene)	landfill
2. K088	spent pot liner - now delisted by EPA but treated as a hazardous waste by Alcoa	landfill
3.		
4.		
5.		
6.		
7.		
8.		

Have these wastes been analyzed for determination of degree of hazard?

... if so, by who:

Yes - Alcoa



USEPA SF



1568445

I. STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE - 262/33142

1. Does generator transport their own hazardous waste: NO
or is waste given to an "outside" contractor _____
2. How many vehicles in use? _____ How many of each type? _____
3. Is generator following RCRA manifest system? N/A
4. Is all pertinent information included (per 262.20/p33143)? _____
5. Is signature of, and date of acceptance by transporter obtained prior to transport? _____

Note special regulations covering the shipments
of wastes by water or rail 263.20 e

6. Is generator aware of, and complying with DOT regulations covering:
 - a. Packaging 49 cfr parts 173, 178 & 179
 - b. Labeling 49 cfr part 172
 - c. Marking 49 cfr part 172
 - d. Placarding 49 cfr part 172 F? _____

Note: Containers <110 gallons must bear the following statement (172.304)

HAZARDOUS WASTE - Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name and address
Manifest document number

7. Is generator aware of, and complying with RCRA record keeping and reporting requirements? _____
 - a. Are signed manifests and test results kept for 3 years? (Longer during unresolved enforcement action) _____
 - b. Are annual reports filed with the regional administrator as per RCRA regulations (EPA forms 8700-13 & 8700-13A, p 33145)?
will next year

Note: Generators who Treat, Store or Dispose of wastes on site must file an annual report in accordance with 40 cfr parts 264, 265, 266 and 122.

8. Is the generator aware of RCRA regulations covering EXCEPTION REPORTS?

yes

- a. If the generator does not receive a signed copy of the manifest back from the designated facility within 35 days - then the transporter and/or facility must be contacted and disposition of the waste determined.
- b. If the generator has not received a signed copy of the manifest after 45 days - then an EXCEPTION REPORT must be filed with the regional administrator which includes:
 - i) a cover letter of explanation
 - ii) a copy of the original manifest

II. STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE - 263/33151

1. Has an EPA Identification number been obtained through RCRA? _____
2. Is transporter aware of and complying with manifest system requirements under 263.20 (p 33151)? _____
 - a. Wastes transported only with accompanying manifest _____
 - b. Signed manifest given to generator before transport _____
 - c. Transfer of waste between successive transporters is documented by passage of signed manifest _____
3. Is the generator notified if the waste (or part of it) can not be delivered to the designated site? _____
4. Are manifests (signed by the Generator, Transporter and Designated facility) kept for a minimum of 3 years? _____

TRANSPORTER RELATED HAZARDOUS WASTE DISCHARGES

263.30

If a transporter spills some hazardous waste - they must (under RCRA) take immediate action to protect human health & the environment i.e.

- : notify authorities
- : dike area . . .

The transporter must clean up his spills to the extent that no hazard to human health or the environment remains

III. STANDARDS APPLICABLE TO HAZARDOUS WASTE TREATMENT,
STORAGE AND DISPOSAL FACILITIES

1. Has facility obtained an EPA identification number yes
and filed their part A application? yes
2. Are hazardous wastes accepted from "outside" sources (wastes not
generated on site)? yes - (delisted) pot liner from Alcoa, Vancouver
 - . If yes, has a chemical and physical analysis of a repre-
sentative sample been obtained? (265.13) yes
3. Has a waste analysis plan been developed which describes the system for
analyzing hazardous wastes 265.13b
 - . parameters to be tested
 - . sampling and analysis methods
 - . testing frequency N/A
4. Have site owner/operators taken appropriate measures to ensure against
unauthorized entry? (265.14) yes
Is area fenced, signed, etc.? yes - fenced and signed

DANGER - UNAUTHORIZED PERSONNEL KEEP OUT

5. Has a specific, written inspection plan been developed, and is it kept
at the facility? no - unsp's 1/wh, no written record (265.15)
6. Is an inspection log maintained? no
7. Has a structured training program for employees been developed?
N/A - not needed due to nature of wastes generated
8. Are incompatible wastes segregated to insure against accidental
ignition, fuming, etc.? N/A
9. Is an emergency communication system readily available in areas where
wastes are stored or handled? (265.34) yes - hand held radios
10. Have local fire and police units been made aware of site layout and
activities? (265.37) N/A - on site fire would be handled by
Alcoa's own staff

CONTINGENCY PLAN

11. Has a facility contingency plan been developed which is designed
to minimize the consequences of any unplanned release of hazardous
waste? no - not applicable due to nature of the
site itself

This plan should include:

- . A list of actions to be taken in the event of a "spill"
(Actions will vary with particular wastes)
- . A description of existing agreements with local fire
and police units
- . An up-to-date listing (with phone #'s) of all persons qualified
to act as on-scene coordinator
- . An up-to-date list of all emergency equipment - including
location and capabilities
- . An evacuation plan if needed

12. Has a primary emergency coordinator been designated?

none specific - designation requested during inspection

OPERATING RECORD

265.73/33239

13. Is a facility operating record kept on site which includes the following elements?

- . A description of each hazardous waste present (including volume)
- . A description of where and when it was disposed of (and any
treatment it received)
- . A map showing disposal site
- . References to any manifests involved
- . Pertinent waste analysis information
- . Closure & post closure estimates

Pottliner is the only waste presently
dumped. Alcoa has data but has
not developed a specific oper-
ating record. They do have a
closure plan and will know
volumes of degreaser dumped

ANNUAL REPORTS

265.75

14. Are annual reports submitted to the regional administrator (by March 1)

Report elements:

will be next year

- . Name and EPA ID number of facility
- . Calendar year covered by the report

- Name and EPA ID number of any generators involved
- Description of the types and volumes of hazardous waste handled
- Description of treatment storage and disposal methods employed
- Monitoring data and closure/post closure estimates

GROUND WATER MONITORING

265.90

- Has the owner/operator implemented a ground water monitoring program?
plan will be submitted by September compliance date
- if not: has a waiver from the regional administrator been obtained? _____
- Does the ground water monitoring program consist of at least one upgradient and 3 immediately downgradient wells? _____
- Has a written well monitoring program been developed? _____
- What is the monitoring frequency (minimum of 1/yr)? _____

Note: Monitoring records must be kept for the life of the facility.

CLOSURE PLAN

265.115

- Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? *yes*
- Has a post closure care plan been developed? *no*

Also also advised as to notification in title requirements

MANAGEMENT OF HAZARDOUS WASTE CONTAINERS

265.170

- Does the facility operate a specific area for container handling or storage? *none needed*
- if yes: does this area receive an official inspection at least weekly? _____

23. Are incompatible wastes segregated? N/A
24. Are ignitable or reactive wastes kept a minimum of 50 feet away from site property line? N/A
25. Are hazardous waste storage tanks operated in a manner which minimizes the possibility of waste loss?
N/A lined tank _____ high level alarm _____ auto shut off
26. Are tanks used for holding hazardous waste inspected on a routine schedule? _____
- 265.194 . daily inspection of tank level & valving
 . weekly inspection of tank integrity
 . weekly inspection of dike integrity
27. Are tanks cleaned of all hazardous waste before being taken out of service? _____

SURFACE IMPOUNDMENTS

28. Is liquid level kept low enough to prevent any overtopping due to storms, wave action, etc.? _____
265.222/minimum of 2 feet freeboard
29. Do earthen dikes have some sort of protective cover which minimizes erosion (grass, shale, rock. . .)? N/A _____
30. Have impounded wastes been analyzed? _____
31. Is analytical data available? _____
32. Are impoundments inspected for level and dike integrity? _____
- 265.226 . level inspections daily
 . integrity inspections weekly
33. Is owner/operator aware of closure regulations? _____
(refer to 265.228/33246)
34. Are ignitable or reactive wastes impounded? _____

WASTE PILES

35. Are hazardous wastes held in piles? No
36. Is wind dispersion of these wastes a problem? _____

37. Is the base of the pile lined? _____ or is it located on impermeable material? _____
38. Is there observable (or evidence of) leachate? _____
39. Is there a leachate collection system? _____
40. Is leachate treated and/or discharged via point source? _____
41. Are there plans to place the pile on an impermeable base and collect and treat leachate _____ or cover pile _____

LAND TREATMENT

42. Are hazardous wastes treated through land farming? NO
43. Are all hazardous land farmed wastes treatable? _____
44. Is run on diverted away from active portions of the landfarm? (265.272b) _____
45. Is run off collected? _____ treated? _____
46. Is analytical data covering land farmed hazardous waste available? _____ Does this information include metals data relating to the EP toxicity test? (see 265.273a) _____
47. Are food chain crops grown on the land form? _____
- .. If yes, the owner/operator should be familiar with conditions outlined in 265.276 p 33247
48. Are records kept which detail land farming activities? (265.279) _____

LANDFILLS

These regulations also apply waste piles

49. Are hazardous wastes disposed of by landfill? Potomac (presently delisted)
50. Is run on diverted away from the fill? yes - burn around edge

- area is lined and Above could pump out water if it were to accumulate
This is pretty arid country -
51. Is run off collected? (265.302) - This is pretty arid country -
52. Is a detailed map of the fill maintained which identifies the location of hazardous wastes? yes
53. Has the owner/operator reviewed closure/post closure regulations? i.e., final cover, infiltration control, etc.? (265.310/p 33249)
yes
54. Are liquid wastes disposed of in the landfill? plan to occasionally in the future

INCINERATORS

265.340

55. Are hazardous wastes disposed of via incinerator? No
56. Is the incinerator brought to operating level prior to adding waste? _____
57. Are records of operation kept? _____
58. Are combustion controls monitored at least every 15 minumts during incineration? _____
59. Is incinerator plume monitored _____ and necessary corrections to combustion equipment made? _____

THERMAL TREATMENT

265.370

60. Do hazardous wastes undergo thermal treatment? No
61. Is thermal treatment unit brought to operating level before adding waste? _____
62. Is treatment unit inspected during operation as per 265.377/p 33250?

- . operating controls every 15 minutes
- . stack plume (emissions) every hour
- . complete unit daily

UNDERGROUND INJECTION

63. Are hazardous wastes disposed of via underground injection? No